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ADMINISTRATIVE AND ENVIRONMENTAL LAW

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December 22, 2021

VIA SCPSC E-FILING DMS

Jocelyn G. Boyd, Esq.
Chief Clerk & Administrator
Public Service Commission of South Carolina
101 Executive Center Drive
Columbia, SC 29210

Re: Annual Review of Base Rates for Fuel Costs for Dominion Energy South Carolina, Inc.
Docket No. 2022-2-E

Dear Ms. Boyd:

Attached for filing in the above-referenced matter please find the *Petition to Intervene Out of Time of CMC Steel South Carolina*. By copy of this letter, I am serving all parties of record via Electronic Mail and First-Class Mail.

Please contact me if you have any questions concerning this filing.

Sincerely,



Alexander G. Shissias

S.C. Bar # 11610

The Shissias Law Firm, LLC

1727 Hampton Street

Columbia, SC 29201

alex@shissiaslawfirm.com

Local Counsel for CMC Steel South Carolina

**BEFORE THE
PUBLIC SERVICE COMMISSION OF SOUTH CAROLINA**

IN RE: Annual Review of Base Rates for)	
Fuel Costs for Dominion Energy South)	Docket No. 2022-2-E
Carolina, Inc.)	

**PETITION TO INTERVENE OUT OF TIME OF
CMC STEEL SOUTH CAROLINA**

CMC Steel South Carolina (“CMC”) hereby petitions to intervene as a party of record in the above-captioned proceeding. CMC states the following grounds in support of its petition.

1) CMC owns and operates a steel manufacturing facility in Cayce, South Carolina. This facility utilizes an electric arc furnace (“EAF”) to melt and recycle scrap steel. This process requires CMC to purchase very large quantities of electricity from Dominion Energy South Carolina, Inc. (“Dominion”) at a cost of millions of dollars per year. Because the cost of electricity is one of the major costs of steelmaking utilizing an EAF, the cost of electricity directly affects CMC’s ability to produce steel at a competitive price. CMC is one of Dominion’s largest retail customers.

2) Due to the magnitude and unique characteristics of its load, CMC cannot be adequately represented by any other party to this proceeding. At this stage of the proceeding, CMC has not fully determined what positions it may take.

3) CMC requests that the Commission grant this Petition to Intervene Out of Time. The Notice of Filing and Public Hearing and Prefile Testimony Letter were issued in this docket on October 13, 2021, and an Amended Notice of Filing and Public Hearing was issued on December 7, 2021. These notices provide that Petitions to Intervene were due December 3, 2021. However, these notices also provide that the first substantive filing in this docket is not due until February 7, 2022, when Dominion is to file its direct testimony and exhibits. CMC regularly

participates in Dominion's annual fuel adjustment proceeding, and other proceedings before the Commission, and CMC's participation in this case may help the Commission determine if any adjustment to Dominion's fuel cost recovery mechanism is necessary and reasonable. Given the early stage of this proceeding, allowing CMC to intervene out of time will not prejudice any party.

- 4) CMC's mailing address is:

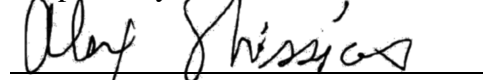
CMC Steel South Carolina
310 New State Road
Cayce, SC 29033

5) I, Alexander Shissias, am authorized to accept service of papers in this proceeding on behalf of CMC. CMC respectfully requests that Damon E. Xenopoulos also be added to the service list as CMC may seek Mr. Xenopoulos's admission to appear before the Commission *pro hac vice* in this docket. Mr. Xenopoulos's address is:

Damon E. Xenopoulos
Stone Mattheis Xenopoulos & Brew, PC
1025 Thomas Jefferson Street, N.W.
Suite 800 West
Washington, DC 20007
(202) 342-0800
Email: dex@smxblaw.com

WHEREFORE, for the reasons set forth above, CMC respectfully requests permission to intervene in this proceeding.

Respectfully submitted,



Alexander G. Shissias

S.C. Bar # 11610

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Local Counsel for CMC Steel South Carolina

Dated: December 22, 2021

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PUBLIC SERVICE COMMISSION OF SOUTH CAROLINA**

IN RE: Annual Review of Base Rates for)	
Fuel Costs for Dominion Energy South)	Docket No. 2022-2-E
Carolina, Inc.)	

CERTIFICATE OF SERVICE

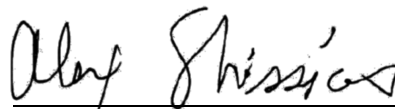
I hereby certify that I have this day served one (1) copy of the foregoing document upon the following parties to this proceeding via Electronic Mail and First-Class Mail:

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Dated: December 22, 2021